

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In the Matter of:

Lori M. Kessler,
26015 Labana Woods Drive
Taylor, MI 48180

Chapter 13
Case No. 15-49327
Judge Maria L. Oxholm

Debtor(s).

XXX-XX- 7141

**OBJECTION TO TRUSTEE'S
NOTICE OF DEFAULT IN PAYMENTS**

The Debtor, through the undersigned counsel, objects to the Trustee's Intent to seek dismissal of her case, and in support states the following:

1. The Debtor admits she is delinquent on her Plan payments.
2. The Debtor, however, lost her second job.
3. The Debtor has obtained a new job to replace the lost job.
4. The Debtor believes she can cure the delinquency with a Plan modification, and has resumed payments.

WHEREFORE, the Debtor asks the Court to allow the Debtor to modify her Plan, and disallow the Trustee from dismissing the Debtor's case.

Respectfully Submitted,

Dated: October 11, 2016

/s/ Thomas Paluchniak
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